



February 28, 2024

**VIA PACER E-FILING**

Hon. Arun Subramanian  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**Re: Does vs. USVI, 1:23-cv-10301-AS**

Dear Hon. Judge Subramanian, U.S.D.J.

I am counsel for Plaintiffs in the above matter.

I write in response to Defendant Delegate Stacey Plaskett's letter requesting a 21-day extension of time to file a "substantial" motion to dismiss the Complaint [ECF # 59].

As this Defendant points out, this Court has granted Plaintiff's request for leave to file an omnibus opposition to all of the anticipated motions by April 2, 2024. An omnibus response would be economical and conserve the parties' resources.

Plaintiff therefore does not oppose Defendant Delegate Stacey Plaskett's request for a 21-day extension of time but requests that Plaintiff's time to file the omnibus opposition be extended accordingly.

Respectfully Submitted,

/s/ Jordan Merson

Jordan K. Merson  
Merson Law, PLLC  
950 Third Avenue  
New York, NY 10022  
(212) 603-9100  
Email: jmerson@mersonlaw.com

*Counsel for Plaintiffs*